

2020.3.8 4.04-4.16pm Email Chain & Attachment

Lake, Stephanie (USANYS)

From: Bove, Emil (USANYS)
Sent: Sunday, March 08, 2020 4:16 PM
To: Krouse, Michael (USANYS); Crowley, Shawn (USANYS); Lake, Stephanie (USANYS); Kim, Jane (USANYS) 4
Subject: RE: Defense letter re curative instruction

Thanks. I dropped Garrett from this. Can we please have the full thread with the January transmittal email + attachment?

From: Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>
Sent: Sunday, March 8, 2020 4:07 PM
To: Crowley, Shawn (USANYS) <SCrowley@usa.doj.gov>; Bove, Emil (USANYS) <EBove@usa.doj.gov>; Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Garrett Lynch <LynchG@dany.nyc.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>
Subject: RE: Defense letter re curative instruction

From: Crowley, Shawn (USANYS) <SCrowley@usa.doj.gov>
Sent: Sunday, March 8, 2020 4:04 PM
To: Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; Bove, Emil (USANYS) <EBove@usa.doj.gov>; Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Garrett Lynch <LynchG@dany.nyc.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>
Subject: RE: Defense letter re curative instruction

Thanks. Can you send us the document itself?

From: Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>
Sent: Sunday, March 08, 2020 4:04 PM
To: Crowley, Shawn (USANYS) <SCrowley@usa.doj.gov>; Bove, Emil (USANYS) <EBove@usa.doj.gov>; Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Garrett Lynch <LynchG@dany.nyc.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>
Subject: Defense letter re curative instruction

This is what they filed.

Michael Krouse
Assistant United States Attorney
Southern District of New York
One St. Andrew's Plaza
New York, NY 10007
(212) 637-2279

Brian M. Heberlig
202 429 8134
bheberlig@steptoe.com

Steptoe

1330 Connecticut Avenue, NW
Washington, DC 20036-1795
202 429 3000 main
www.steptoe.com

March 8, 2020

By ECF

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
40 Foley Square, Room 2102
New York, NY 10007

Re: *United States v. Ali Sadr Hashemi Nejad*, Case No. 18-cr-224 (AJN)

Dear Judge Nathan:

On behalf of Defendant Ali Sadr Hashemi Nejad, we write to request a curative instruction. We have conferred with the government who stated that it opposes this request.

On Saturday afternoon around 4:00 p.m., the government produced GX 411 (attached as Exhibit A), which had not been previously disclosed to the defense. GX 411 reveals that in connection with the first U.S. dollar payment in this case, the intermediary bank wrote a letter to OFAC disclosing certain information about the transactions. Among other things, the intermediary bank disclosed to OFAC that Stratus Turkey (Stratus International Contracting J.S.) was affiliated with Stratus Iran (Stratus International Contracting Company) and implied that the two companies were either unitary or cooperating on the Ojeda project in Venezuela. The intermediary bank attached Stratus Iran's website describing its ongoing work on the Ojeda project. The intermediary bank concluded that this information was not subject to mandatory disclosure as indicated by its note that it was "voluntarily informing OFAC." The government has not produced any response from OFAC and to defense counsel's knowledge, no response exists. *Cf. Tr. 580, Test. of Ted Kim (Mar. 5, 2020)* (agreeing that to his knowledge, "this matter was never investigated by OFAC").

GX 411 is exculpatory evidence that:

- Stratus Turkey's affiliation with Stratus Iran was not material either to OFAC or the intermediary banks;
- intermediary banks conducted independent investigation and could easily identify the affiliation between Stratus Turkey and Stratus Iran or even (erroneously)

The Honorable Alison J. Nathan
March 8, 2020
Page 2

conclude that the two companies were a single entity that “may be an Iranian company”; and

- neither the intermediary bank nor OFAC deemed the disparities in information about the two Stratus International Contractings working on the Ojeda project as important enough to stop U.S. dollar payments to Stratus International Contracting J.S.

The government should have disclosed GX 411 under *Brady*, *Giglio*, and Rule 16.

In light of the government’s failure to disclose this evidence before trial,¹ the defense respectfully requests a curative instruction. Based on a similar mid-trial disclosure in *United States v. Slough*, Judge Lamberth issued the curative instruction attached as Exhibit B. The defense has pasted that instruction below, edited only to reflect the facts of this case:

Government Exhibit 411 is a June 2011 letter regarding an April 2011 transaction involving Stratus International Contracting Company. You saw that evidence this morning instead of earlier in trial because the government failed to turn it over before trial as required by law. The defendant learned of that evidence on Saturday afternoon when the government disclosed it.

Tr. 6, *United States v. Slough*, No. 08-cr-360-RCL (D.D.C. Aug. 5, 2014) (relevant text highlighted in Ex. B). The defense requests that this instruction be read to the jury on Monday after GX 411 is admitted. The government opposes this request but does not object to the defense admitting this document in its case if the government chooses not to offer it.

Respectfully submitted,

/s/ Brian M. Heberlig

Reid H. Weingarten

STEPTOE & JOHNSON LLP

1114 Avenue of the Americas

New York, NY 10036

Tel: (212) 506-3900

Fax: (212) 506-3950

rweingarten@steptoe.com

¹ The government represents that it learned of this evidence in mid-January 2020 and that it came from an unrelated DANY investigation. The government states that it believed this document was part of the Commerzbank subpoena return that was produced in discovery. It was not.

Steptoe

The Honorable Alison J. Nathan
March 8, 2020
Page 3

Brian M. Heberlig (*Pro Hac Vice*)
Bruce C. Bishop (*Pro Hac Vice*)
David M. Fragale
Nicholas P. Silverman (*Pro Hac Vice*)
STEPTOE & JOHNSON LLP
1330 Connecticut Avenue, N.W.
Washington, DC 20036
Tel: (202) 429-3000 Bishop
Fax: (202) 429-3902
bheberlig@steptoe.com

Counsel for Defendant Ali Sadr Hashemi Nejad

cc: Counsel of Record (via ECF)



NEW YORK BRANCH

Department of the Treasury
Office of Foreign Assets Control
1500 Pennsylvania Avenue NW
Washington DC 20220

Vinay Jepak
2 World Financial Center, New York, NY 10281-1050
Telephone (212) 266-7200
Fax (212) 266-7235
vinay.jepak@commerzbank.com

June 16, 2011

Re: Information Sharing – Stratus International Contracting Company

Dear Sir/Madam:

Commerzbank AG, New York Branch (CBNY) would like to share the following information with OFAC. On April 20, 2011 CBNY's AML transaction monitoring system generated an alert, which involved a transaction for USD 29,442,967.57 value April 4, 2011.

The transaction was originated by Banco Del Tesoro, CA Banco Universal Caracas for its client BT / Fideicomiso / Fondo Chino Venezolano in Caracas, Venezuela. The beneficiary of the payment was Stratus International Contracting Company ("Stratus"), a client of Hyposwiss Privatbank AG, Zurich.

As per standard procedure, CBNY initiated a request for information to the remitting bank Banco Del Tesoro, CA Banco Universal Caracas, Venezuela to obtain details on both entities and their relationship. In the interim, CBNY conducted further due diligence and noted the following regarding Stratus from its website:

- Stratus was founded in 1978 in Tehran, Iran
- Stratus International specializes in providing contracting services to infrastructure projects such as roads, railways, dams, tunnels, airports and buildings.
- Stratus is presently working on a 7000 Apartment Unit "New Ojeda" Housing Development Project in Venezuela

On May 12, 2011, CBNY received a response from the bank in Caracas indicating the following:

- Stratus's physical address is Gardenya Plaza 5, K:3 D:3 (Floor 3, Suite3) 34758 Atasehir, Istanbul, Turkey
- Stratus is registered in Istanbul, Turkey (copy of the registration attached)
- Stratus provides construction services in Turkey, Dubai and Venezuela
- The purpose of the payment is for the construction of a 7000 apartment unit project "Proyecto Urbanismo Nueva Ciudad Fabricio Ojeda, in Cuidad Ojeda, Estado Zuila, Venezuela (same address as listed on Stratus' website)

Although Stratus is not listed as an SDN, and the payment does not indicate any direct involvement of Iran or with Iran, due to conflicting information between the website and the response forwarded by the bank in Caracas, CBNY believes it appropriate to share this information with OFAC since Stratus may be an Iranian Company.

Chairman of the Supervisory Board: Klaus-Peter Müller
Board of Managing Directors: Martin Blessing (Chairman),
Frank Annuscheit, Markus Beumer, Achim Kassow, Jochen Klösges,
Michael Reuther, Stefan Schmittmann, Ulrich Sieber, Eric Strutz, Martin Zielke

Commerzbank Aktiengesellschaft, Frankfurt am Main
Registered Office: Frankfurt am Main Reg.No. 32000
VAT No. DE 114 103 514



NEW YORK BRANCH

Re: Information Sharing – Stratus International Contracting Company– Page 2

We have added Stratus into our sanctions filter to monitor any future payments. Please note that apart from this transaction, there have not been any other payments involving Stratus processed by CBNY to date.

The purpose of this letter is to report the good faith efforts of Commerzbank AG, New York Branch in complying with applicable OFAC requirements and voluntarily informing OFAC of any information received during its investigation into possible sanctions-related entities.

Should you have any further questions concerning this matter, please do not hesitate to contact the signatories below.

Respectfully,

Commerzbank AG
New York Branch

A handwritten signature in dark ink, appearing to read "Deepa Keswani".

Deepa Keswani
Head of AML/Anti-Fraud/Sanctions Compliance

A handwritten signature in dark ink, appearing to read "Vinay Jepal".

Vinay Jepal
Sanctions Compliance Officer

Encls.

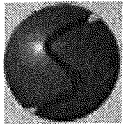
stratus intl payment

:LT Address	:COBAUS3XA
:transaction type	:202 COVER bank tfr favour 3rd bank
:input from	:COBADEFF
	COMMERZBANK AG FRANKFURT
	HEAD OFFICE
	32-36 NEUE MAINZERSTRASSE
	60261 FRANKFURT GERMANY
:validation Flag	:COV}

{4: Text block:

:20 /transaction reference number	:FAAS109400150500
:21 /related reference	:FAAS109400150500
:32A/value date	:040411 USD 29,442,967.57
:52A/ordering institution - BIC	:COBADEFF
	COMMERZBANK AG
	FRANKFURT AM MAIN
:57A/account with inst - BIC	:CHASUS33
	JPMORGAN CHASE BANK, N.A.
	NEW YORK, NY
:58A/beneficiary inst - BIC	:SHHBCHZZ
	HYPOSWISS PRIVATBANK AG, ZURICH
	ZURICH
:50K/ordering customer	:/400887746602USD
	BT/ FIDEICOMISO / FONDO CHINO
	VENEZOLANO. AV GUICAIPURO. URB EL
	ROSAL. TORRE BANCO DEL TESORO.
	CARACAS - VENEZUELA.
:52A/ordering institution - BIC	:BDTEVECA
	BANCO DEL TESORO, C.A. BANCO
	UNIVERSAL
	CARACAS
:59 /beneficiary customer	:/CH7708530519663100203
	STRATUS INTERNATIONAL CONTRACTING
	J.S.
:70 /details of payment	:REF: DESEMBOLSO NRO. 386 FONDO
	CHINO VENEZOLANO. CODIGO NRO.
	00579.
:33B/amount	:USD 29,442,967.57}

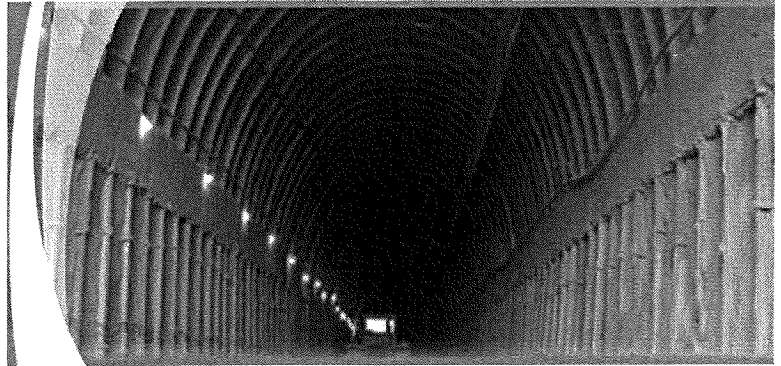
Entry : /SWIFT/ Date:110404 Time:02:44:17
Info:1111/001781



Stratus International
Contracting Company

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STRATUS International Contracting Company has been founded in 1978 in Tehran, Iran, with registered paid up share capital of RIs 100 billions. STRATUS provides contracting services to infrastructure projects such as Roads, Railways, Dams, Tunnels, Airports and Buildings. Since 1994, STRATUS has been the first pioneered company in exporting Engineering and Technical Services in Iran and received **"Exemplary Exporters"** of the year 1999 from his excellency Mr. president.



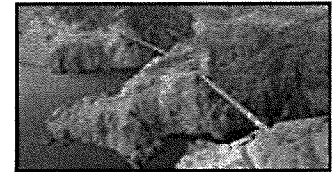
- STRATUS is an Engineering, Construction, Management and Contracting Company by specializing in the field of Building Construction, Road Works and Water Works.

STRATUS is Graded in three major categories: [Read more...](#)

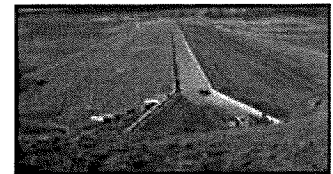
- STRATUS has succeeded to receive ISO 9001-2000 certificate for Quality Management System from MIC registered under UKAS, United Kingdom from 2004 which upgraded recently to ISO 9001-2008 in 2010 and intending to extend it by OHSAS 18001:2007. [Read more...](#)

- Our memberships:
 - Federation of Contractors of Islamic Countries (F.C.I.C.)
 - Pakistan Engineering Council
 - International Chamber of Commerce (I.C.C.)
 - Iran – UK Chamber of Commerce
 - Iran – Canada Chamber of Commerce [Read more...](#)

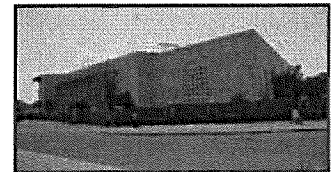
Road & Railway

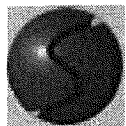


Dam



Building

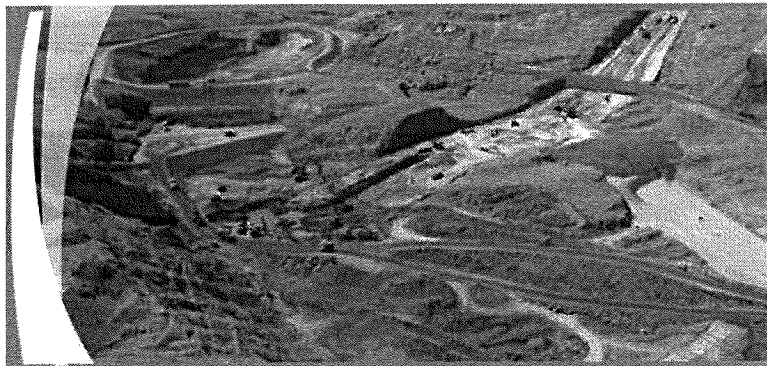


[Contact](#)

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Contact Us

STRATUS International Contracting Co.

Address: **No.35, Golestan St., Iran Zamin Ave., Shahrake Ghods, Tehran, Iran.**

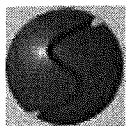
Postal Code: **1465865187**

Tell: **(98) 21 8837 3100-6**

Fax: **(98) 21 8808 2882**

E-mail: **stratus@stratusgc.com**

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STRATUS International Contracting Company has been founded in 1978 in Tehran, Iran, with registered paid up share capital of Rls 100 billions. STRATUS provides contracting services to infrastructure projects such as Roads, Railways, Dams, Tunnels, Airports and Buildings. Since 1994, STRATUS has been the first pioneered company in exporting Engineering and Technical Services in Iran and received "**Exemplary Exporters**" of the year 1999 from his excellency Mr. president.



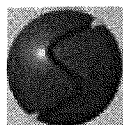
Branch Offices

Middle East
Iran
Iraq

CIS
Kazakhstan

South America
Venezuela

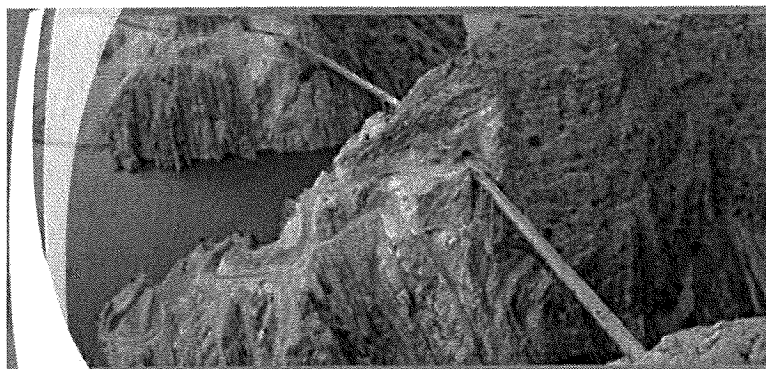
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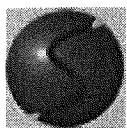
STRATUS International Contracting Company has been founded in 1978 in Tehran, Iran, with registered paid up share capital of RIs 100 billions. STRATUS provides contracting services to infrastructure projects such as Roads, Railways, Dams, Tunnels, Airports and Buildings. Since 1994, STRATUS has been the first pioneered company in exporting Engineering and Technical Services in Iran and received **"Exemplary Exporters"** of the year 1999 from his excellency Mr. president.



Sister Companies List

-  1. Samaneh Stratus (INVESTMENT CO.)
-  2. Iran Construction Investment Co.
-  3. Eghtesad - Novin Bank
-  4. Pishgaman Bazar Novin (BROKERAGE CO.)
-  5. Novin Insurance Co.
-  6. Pars Shahr Co.
-  7. Global Petro Tech CO.
-  8. Keyhan Tabadol Co.
-  9. Pars Hanza Aluminium CO.
-  10. Azarbaijan Industry Development Co.
-  11. Eghtesad Novin Investment CO.
-  12. Samaneh Gostar Novin

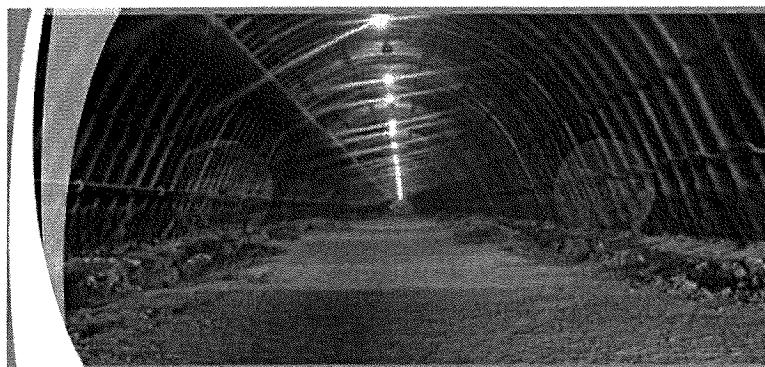
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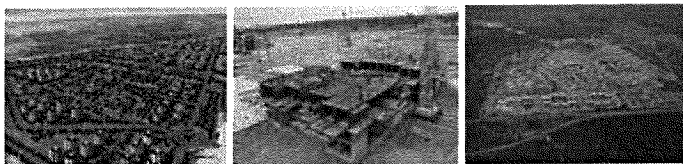
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STRATUS International Contracting Company has been founded in 1978 in Tehran, Iran, with registered paid up share capital of RIs 100 billions. STRATUS provides contracting services to infrastructure projects such as Roads, Railways, Dams, Tunnels, Airports and Buildings. Since 1994, STRATUS has been the first pioneered company in exporting Engineering and Technical Services in Iran and received "**Exemplary Exporters**" of the year 1999 from his excellency Mr. president.



7000 Units 'New Ojeda' Housing Development Project

Main Technical Features	Site Gross Area : 318 Hec. Concrete works : 520,000 m ³ Net Construction Area : 850.000 m ² Water & Sewage network : 150 Km Electrical network : 200 Km Communication network : 220 Km Gas network : 30 Km
Location	Ciudad Ojeda, Zulia State, Venezuela
Employer	Ducolsa 'Urban Development S.A' 
Contract Duration	48 Months
Date of Award	September 2009
Status	[Under Construction]



[\[Back to list\]](#)



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STRATUS International Contracting Company has been founded in 1978 in Tehran, Iran, with registered paid up share capital of Rls 100 billions. STRATUS provides contracting services to infrastructure projects such as Roads, Railways, Dams, Tunnels, Airports and Buildings. Since 1994, STRATUS has been the first pioneered company in exporting Engineering and Technical Services in Iran and received "**Exemplary Exporters**" of the year 1999 from his excellency Mr. president.



Dalbandin – Nokkundi Highway - Section III-B

[Details >>](#)



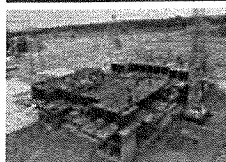
Socotra Airport

[Details >>](#)



Design & Construction of Parliament Building & Commercial Center in Djibouti City

[Details >>](#)



7000 Units "New Ojeda" Housing Development Project

[Details >>](#)

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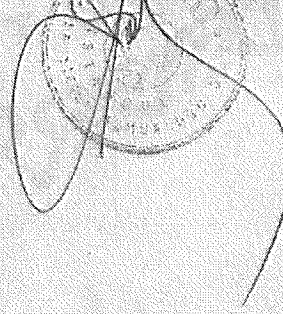
T.C.
İSTANBUL
Ticaret Sicil Memurluğu

(KADIKÖY)
370857 - 2010

SİCİL TASDİKNAME Sİ

Ticaret Ünvanı	STRATUS INTERNATIONAL CONTRACTING İNŞAAT VE TAAHHÜT ANONİM ŞİRKETİ
Sicil No.	751671
Tescil Tarihi	22 / 10 / 2010
İşletme Merkezinin Adresi (Şubenin tescilinde şubenin Adresi ile beraber merkez adresi de yazılır.)	GARDENYA PLAZA 5 K.3 D.3 ATAŞEHİR
İşletmenin uğraştığı işler	Ana sözleşmesinde yazılı olan işler
İşletme sahibinin hüviyeti (Hükmi şahıslarda, hükmi şahsın mahiyeti)	Anonim
İşletme temsilcileri	38824643592 TC.No.lu CELAL TATLICIBAŞI
Tasdiknamenin düzenlenme Tarih ve Sayısı	22 EKİM 2010 - 39185

RECAİ SÖKMEN
İSTANBUL TİCARET SİCİLİ
MEMURU YARDIMCISI



2020.3.8 4.20pm Email & Attachment

Lake, Stephanie (USANYS)

From: Lake, Stephanie (USANYS)
Sent: Sunday, March 08, 2020 4:20 PM
To: Bove, Emil (USANYS); Crowley, Shawn (USANYS)
Cc: Krouse, Michael (USANYS); Kim, Jane (USANYS) 4
Subject: FW: Sadr - wire transfers
Attachments: Commerz OFAC disclosure.pdf

This is the chain. None of us responded. I briefly discussed it with Garrett.

From: Lynch, Garrett <LynchG@dany.nyc.gov>
Sent: Friday, January 10, 2020 4:52 PM
To: Lake, Stephanie (USANYS) <SLake@usa.doj.gov>
Cc: Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>
Subject: RE: Sadr - wire transfers

In the spirit of closing the loop on the \$29M payment through Commerz, attached is the voluntary disclosure Commerze made to OFAC re: the payment.

From: Lake, Stephanie (USANYS) [<mailto:Stephanie.Lake@usdoj.gov>]
Sent: Friday, January 10, 2020 3:16 PM
To: Lynch, Garrett <LynchG@dany.nyc.gov>
Cc: Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>; Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>
Subject: RE: Sadr - wire transfers

Closing the loop on this– I found a document in the material Fuenmayor gave us that discusses the \$29 million transfer through Fondo Chino, and he also mentioned it in the last meeting. I think this should be helpful in tying the wire information we have showing the Fondo Chino transfer to PDVSA. The doc is attached, if anyone cares, but it's also en Espanol (I've requested translation). Pages 14-15.

From: Lynch, Garrett <LynchG@dany.nyc.gov>
Sent: Wednesday, January 08, 2020 12:46 PM
To: Lake, Stephanie (USANYS) <SLake@usa.doj.gov>
Cc: Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>
Subject: RE: Sadr - wire transfers

The Venezuelans used various state-owned “funds” and banks to fund various government projects, among them BANDES, the economic and social development bank (which, I believe made some early payments (not ours) related to the project), and Fondo Chino (the Chinese-Venezuelan Fund). Fondo Chino (at least ostensibly) was funded by oil sales to and loans from China (I think PDVSA and the government liberally moved money around). I forget exactly why Fondo Chino was used to make the first payment (or if we ever knew for sure) – my guess is that PDVSA, which controlled all oil-related funds (i.e., the Venezuelan purse), had adequate funds in the Fondo Chino account to make the payment from that account. I believe the money came from a Banco del Tesoro account in Venezuela, which had a correspondent relationship with Commerz in Germany. Thereafter, they used PDVSA accounts at Banco Espirito Santo in Portugal.

From: Lake, Stephanie (USANYS) [<mailto:Stephanie.Lake@usdoj.gov>]
Sent: Wednesday, January 8, 2020 11:02 AM
To: Lynch, Garrett <LynchG@dany.nyc.gov>

Cc: Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>; Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>

Subject: RE: Sadr - wire transfers

Found the first one. Thanks. Do you know why it came from "Fondo Chino" / what that is?

That's fine on two. Just wanted to make sure I wasn't missing some other records that would show that information.

Definitely agree on the third point.

Thank you!

From: Lynch, Garrett <LynchG@dany.nyc.gov>

Sent: Wednesday, January 08, 2020 10:04 AM

To: Lake, Stephanie (USANYS) <SLake@usa.doj.gov>

Cc: Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>

Subject: RE: Sadr - wire transfers

1. Re: the first payment, there should be a copy of the SWIFT message in the Commerzbank production. In my version of the subpoena compliance production it's a PDF titled "Copy".
2. Re: the identity of the intermediary bank, the bank whose business record the wire transfer is is the intermediary bank, so the witness will be able to state that.
3. Also, for several of the payments, we have additional search warrant documents -- e.g., while we may just have the wire transfer record from the clearing bank, we may also have a SWIFT message attached to an email, or a Hyposwiss record, or some other document which identifies the payment route. When the dust settles on the SW docs, we can reconstruct my old payments binders where I had all of the documents bundled together for each payment (the payment instruction letter, the bank record(s), emails, attachments, etc.). This is what we did for the GJ.

From: Lake, Stephanie (USANYS) [<mailto:Stephanie.Lake@usdoj.gov>]

Sent: Tuesday, January 7, 2020 6:19 PM

To: Lynch, Garrett <LynchG@dany.nyc.gov>

Subject: FW: Sadr - wire transfers

My original email had three attachments, which had to be sent to you securely. So you should be getting a secure message with instructions on how to access it.

From: Lake, Stephanie (USANYS)

Sent: Tuesday, January 07, 2020 5:37 PM

To: Lynch, Garrett <LynchG@dany.nyc.gov>; Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>

Subject: Sadr - wire transfers

See attached a spreadsheet (Payments) showing each transfer and where I found documentation. A few things:

- 1) I didn't find a wire confirmation for the 4/4/2011 \$29 million transfer. I did find reference to it in the CHIPS subpoena returns. It seems to show that it went from "Fondo Chino-Venezolano" to Stratus International

Contracting (see attached two spreadsheets that show this). Garrett – do you know if we have a wire confirmation for that transfer?

- 2) I noticed that the wire confirmations don't generally show the U.S. intermediary bank on them. Is there other documentation I'm missing that has this information?

*All documents are saved here: \\Usa.doj.gov\cloud\NYS\StAndrews\Shared\Iran_VEhousing-2017R01160\###Trial\Documents\Payment Records and here: \\Usa.doj.gov\cloud\NYS\StAndrews\Shared\Iran_VEhousing-2017R01160\Evidence [INT]\Discovery\#5 - Subpoena Returns\To Produce.

Also – Garrett, I was thinking that if you don't already have the ability to remotely login to our network, we should have that set up! That way the file paths above wouldn't be useless to you.

Thanks!

Stephanie Lake
Assistant United States Attorney
Southern District of New York
One Saint Andrew's Plaza
New York, NY 10007
Tel: (212) 637-1066

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NEW YORK BRANCH

Department of the Treasury
Office of Foreign Assets Control
1500 Pennsylvania Avenue NW
Washington DC 20220

Vinay Jepsal
2 World Financial Center, New York, NY 10281-1050
Telephone (212) 266-7200
Fax (212) 266-7235
vinay.jepsal@commerzbank.com

June 16, 2011

Re: Information Sharing – Stratus International Contracting Company

Dear Sir/Madam:

Commerzbank AG, New York Branch (CBNY) would like to share the following information with OFAC. On April 20, 2011 CBNY's AML transaction monitoring system generated an alert, which involved a transaction for USD 29,442,967.57 value April 4, 2011.

The transaction was originated by Banco Del Tesoro, CA Banco Universal Caracas for its client BT / Fideicomiso / Fondo Chino Venezolano in Caracas, Venezuela. The beneficiary of the payment was Stratus International Contracting Company ("Stratus"), a client of HypoSwiss Privatbank AG, Zurich.

As per standard procedure, CBNY initiated a request for information to the remitting bank Banco Del Tesoro, CA Banco Universal Caracas, Venezuela to obtain details on both entities and their relationship. In the interim, CBNY conducted further due diligence and noted the following regarding Stratus from its website:

- Stratus was founded in 1978 in Tehran, Iran
- Stratus International specializes in providing contracting services to infrastructure projects such as roads, railways, dams, tunnels, airports and buildings.
- Stratus is presently working on a 7000 Apartment Unit "New Ojeda" Housing Development Project in Venezuela

On May 12, 2011, CBNY received a response from the bank in Caracas indicating the following:

- Stratus's physical address is Gardenya Plaza 5, K:3 D:3 (Floor 3, Suite3) 34758 Atasehir, Istanbul, Turkey
- Stratus is registered in Istanbul, Turkey (copy of the registration attached)
- Stratus provides construction services in Turkey, Dubai and Venezuela
- The purpose of the payment is for the construction of a 7000 apartment unit project "Proyecto Urbanismo Nueva Ciudad Fabricio Ojeda, in Ciudad Ojeda, Estado Zulia, Venezuela (same address as listed on Stratus' website)

Although Stratus is not listed as an SDN, and the payment does not indicate any direct involvement of Iran or with Iran, due to conflicting information between the website and the response forwarded by the bank in Caracas, CBNY believes it appropriate to share this information with OFAC since Stratus may be an Iranian Company.

Chairman of the Supervisory Board: Klaus-Peter Müller
Board of Managing Directors: Martin Blessing (Chairman),
Frank Annuscheit, Markus Beumer, Achim Kassow, Jochen Klösges,
Michael Reuther, Stefan Schmittmann, Ulrich Sieber, Eric Strutz, Martin Zielke

Commerzbank Aktiengesellschaft, Frankfurt am Main
Registered Office: Frankfurt am Main Reg.No. 32000
VAT No. DE 114 103 514



NEW YORK BRANCH

Re: Information Sharing – Stratus International Contracting Company– Page 2

We have added Stratus into our sanctions filter to monitor any future payments. Please note that apart from this transaction, there have not been any other payments involving Stratus processed by CBNY to date.

The purpose of this letter is to report the good faith efforts of Commerzbank AG, New York Branch in complying with applicable OFAC requirements and voluntarily informing OFAC of any information received during its investigation into possible sanctions-related entities.

Should you have any further questions concerning this matter, please do not hesitate to contact the signatories below.

Respectfully,

Commerzbank AG
New York Branch

A handwritten signature in dark ink, appearing to read "Deepa Keswani".

Deepa Keswani
Head of AML/Anti-Fraud/Sanctions Compliance

A handwritten signature in dark ink, appearing to read "Vinay Jepal".

Vinay Jepal
Sanctions Compliance Officer

Encls.

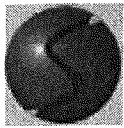
stratus intl payment

:LT Address	:COBAUS3XA
:transaction type	:202 COVER bank tfr favour 3rd bank
:input from	:COBADEFF
	COMMERZBANK AG FRANKFURT
	HEAD OFFICE
	32-36 NEUE MAINZERSTRASSE
	60261 FRANKFURT GERMANY
:validation Flag	:COV}

{4: Text block:

:20 /transaction reference number	:FAAS109400150500
:21 /related reference	:FAAS109400150500
:32A/value date	:040411 USD 29,442,967.57
:52A/ordering institution - BIC	:COBADEFF
	COMMERZBANK AG
	FRANKFURT AM MAIN
:57A/account with inst - BIC	:CHASUS33
	JPMORGAN CHASE BANK, N.A.
	NEW YORK, NY
:58A/beneficiary inst - BIC	:SHHBCHZZ
	HYPOSWISS PRIVATBANK AG, ZURICH
	ZURICH
:50K/ordering customer	:/400887746602USD
	BT/ FIDEICOMISO / FONDO CHINO
	VENEZOLANO. AV GUICAIPURO. URB EL
	ROSAL. TORRE BANCO DEL TESORO.
	CARACAS - VENEZUELA.
:52A/ordering institution - BIC	:BDTEVECA
	BANCO DEL TESORO, C.A. BANCO
	UNIVERSAL
	CARACAS
:59 /beneficiary customer	:/CH7708530519663100203
	STRATUS INTERNATIONAL CONTRACTING
	J.S.
:70 /details of payment	:REF: DESEMBOLSO NRO. 386 FONDO
	CHINO VENEZOLANO. CODIGO NRO.
	00579.
:33B/amount	:USD 29,442,967.57}

Entry : /SWIFT/ Date:110404 Time:02:44:17
Info:1111/001781



Stratus International
Contracting Company

فارسی | [Staff Login](#) | [Site Map](#) | [Hon](#)

STRATUS International Contracting Company has been founded in 1978 in Tehran, Iran, with registered paid up share capital of RIs 100 billions. STRATUS provides contracting services to infrastructure projects such as Roads, Railways, Dams, Tunnels, Airports and Buildings. Since 1994, STRATUS has been the first pioneered company in exporting Engineering and Technical Services in Iran and received **"Exemplary Exporters"** of the year 1999 from his excellency Mr. president.



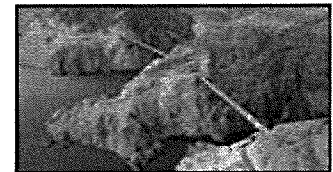
- STRATUS is an Engineering, Construction, Management and Contracting Company by specializing in the field of Building Construction, Road Works and Water Works.

STRATUS is Graded in three major categories: [Read more...](#)

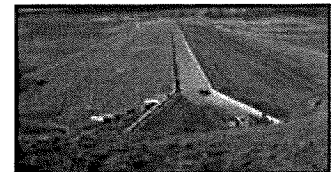
- STRATUS has succeeded to receive ISO 9001-2000 certificate for Quality Management System from MIC registered under UKAS, United Kingdom from 2004 which upgraded recently to ISO 9001-2008 in 2010 and intending to extend it by OHSAS 18001:2007. [Read more...](#)

- Our memberships:
 - Federation of Contractors of Islamic Countries (F.C.I.C.)
 - Pakistan Engineering Council
 - International Chamber of Commerce (I.C.C.)
 - Iran – UK Chamber of Commerce
 - Iran – Canada Chamber of Commerce [Read more...](#)

Road & Railway

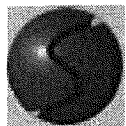


Dam



Building

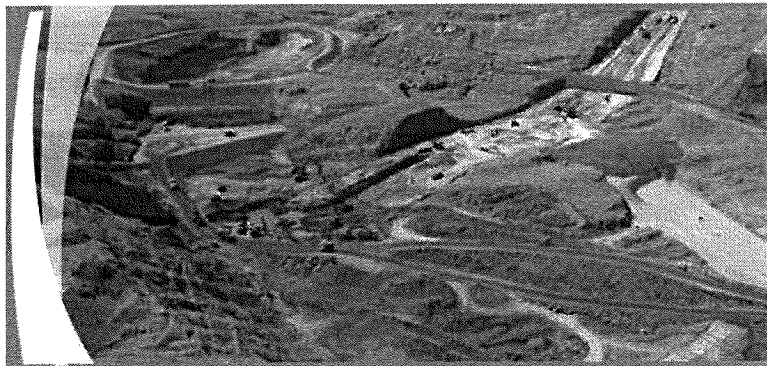




Stratus International
Contracting Company

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STRATUS International Contracting Company has been founded in 1978 in Tehran, Iran, with registered paid up share capital of RIs 100 billions. STRATUS provides contracting services to infrastructure projects such as Roads, Railways, Dams, Tunnels, Airports and Buildings. Since 1994, STRATUS has been the first pioneered company in exporting Engineering and Technical Services in Iran and received "**Exemplary Exporters**" of the year 1999 from his excellency Mr. president.



Contact Us

STRATUS International Contracting Co.

Address: **No.35, Golestan St., Iran Zamin Ave., Shahrake Ghods, Tehran, Iran.**

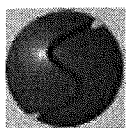
Postal Code: **1465865187**

Tell: **(98) 21 8837 3100-6**

Fax: **(98) 21 8808 2882**

E-mail: **stratus@stratusgc.com**

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Stratus International
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STRATUS International Contracting Company has been founded in 1978 in Tehran, Iran, with registered paid up share capital of Rls 100 billions. STRATUS provides contracting services to infrastructure projects such as Roads, Railways, Dams, Tunnels, Airports and Buildings. Since 1994, STRATUS has been the first pioneered company in exporting Engineering and Technical Services in Iran and received "**Exemplary Exporters**" of the year 1999 from his excellency Mr. president.



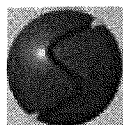
Branch Offices

Middle East
Iran
Iraq

CIS
Kazakhstan

South America
Venezuela

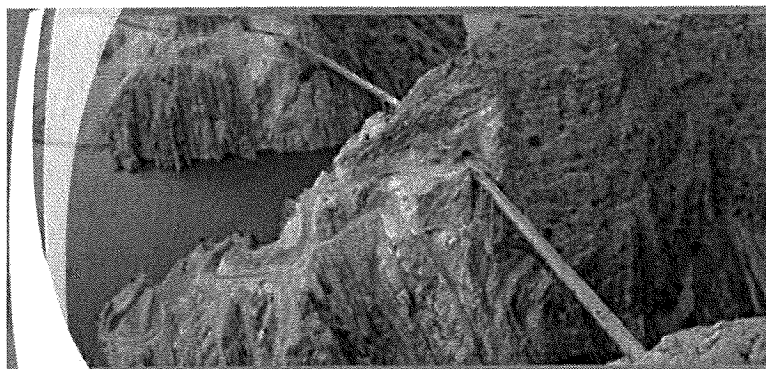
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Contracting Company

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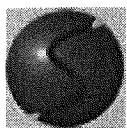
STRATUS International Contracting Company has been founded in 1978 in Tehran, Iran, with registered paid up share capital of RIs 100 billions. STRATUS provides contracting services to infrastructure projects such as Roads, Railways, Dams, Tunnels, Airports and Buildings. Since 1994, STRATUS has been the first pioneered company in exporting Engineering and Technical Services in Iran and received **"Exemplary Exporters"** of the year 1999 from his excellency Mr. president.



Sister Companies List

-  1. Samaneh Stratus (INVESTMENT CO.)
-  2. Iran Construction Investment Co.
-  3. Eghtesad - Novin Bank
-  4. Pishgaman Bazar Novin (BROKERAGE CO.)
-  5. Novin Insurance Co.
-  6. Pars Shahr Co.
-  7. Global Petro Tech CO.
-  8. Keyhan Tabadol Co.
-  9. Pars Hanza Aluminium CO.
-  10. Azarbaijan Industry Development Co.
-  11. Eghtesad Novin Investment CO.
-  12. Samaneh Gostar Novin

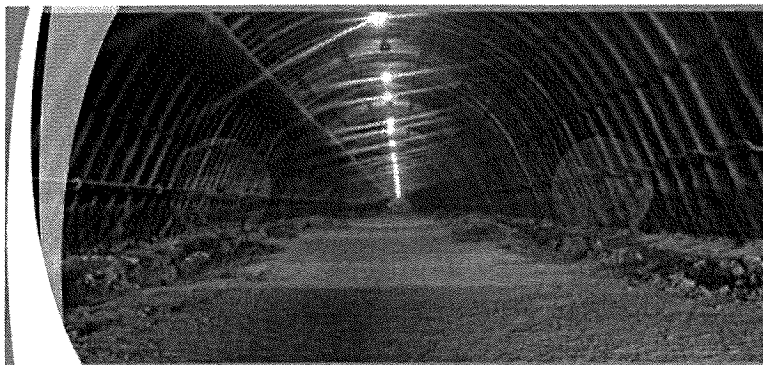
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Stratus International
Contracting Company

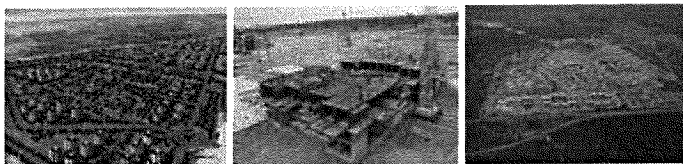
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7000 Units 'New Ojeda' Housing Development Project

Main Technical Features	Site Gross Area : 318 Hec. Concrete works : 520,000 m ³ Net Construction Area : 850.000 m ² Water & Sewage network : 150 Km Electrical network : 200 Km Communication network : 220 Km Gas network : 30 Km
Location	Ciudad Ojeda, Zulia State, Venezuela
Employer	Ducolsa 'Urban Development S.A' 
Contract Duration	48 Months
Date of Award	September 2009
Status	[Under Construction]



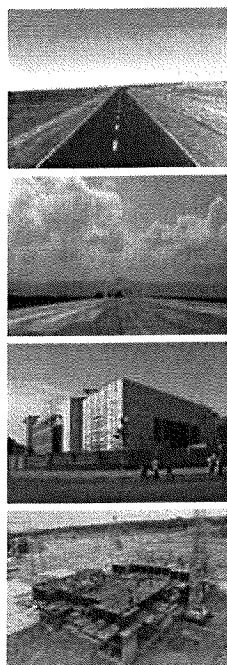
[\[Back to list\]](#)



Stratus International
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STRATUS International Contracting Company has been founded in 1978 in Tehran, Iran, with registered paid up share capital of RIs 100 billions. STRATUS provides contracting services to infrastructure projects such as Roads, Railways, Dams, Tunnels, Airports and Buildings. Since 1994, STRATUS has been the first pioneered company in exporting Engineering and Technical Services in Iran and received "**Exemplary Exporters**" of the year 1999 from his excellency Mr. president.



Dalbandin – Nokkundi Highway - Section III-B

[Details >>](#)

Socotra Airport

[Details >>](#)

Design & Construction of Parliament Building & Commercial Center in Djibouti City

[Details >>](#)

7000 Units "New Ojeda" Housing Development Project

[Details >>](#)

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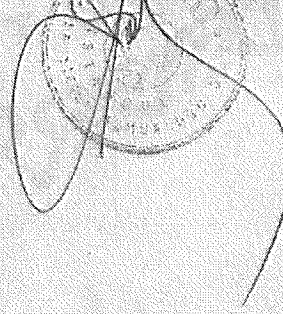
T.C.
İSTANBUL
Ticaret Sicil Memurluğu

(KADIKÖY)
370857 - 2010

SİCİL TASDİKNAME Sİ

Ticaret Ünvanı	STRATUS INTERNATIONAL CONTRACTING İNŞAAT VE TAAHHÜT ANONİM ŞİRKETİ
Sicil No.	751671
Tescil Tarihi	22 / 10 / 2010
İşletme Merkezinin Adresi (Şubenin tescilinde şubenin Adresi ile beraber,merkezin adresi de yazılır.)	GARDENYA PLAZA 5 K.3 D.3 ATAŞEHİR
İşletmenin uğraştığı işler	Ana sözleşmesinde yazılı olan işler
İşletme sahibinin hüviyeti (Hükmi şahıslarda, hükmi şahsın mahiyeti)	Anonim
İşletme temsilcileri	38824643592 TC.No.lu CELAL TATLICIBAŞI
Tasdiknamenin düzenlenme Tarih ve Sayısı	22 EKİM 2010 - 39185

RECAİ SÖKMEN
İSTANBUL TİCARET SİCİLİ
MEMURU YARDIMCISI



2020.3.8 5.03pm Email & Attachment

Lake, Stephanie (USANYS)

From: Lake, Stephanie (USANYS)
Sent: Sunday, March 08, 2020 5:03 PM
To: Bove, Emil (USANYS); Crowley, Shawn (USANYS)
Subject: Fwd: Order in 18cr224
Attachments: 18cr224 Order 03.8.20.pdf; ATT00001.htm

Begin forwarded message:

From: Nathan NYSD Chambers <NathanNYSDChambers@nysd.uscourts.gov>
Date: March 8, 2020 at 5:01:03 PM EDT
To: "Kim, Jane (USANYS) 4" <JKim4@usa.doj.gov>, "Lake, Stephanie (USANYS)" <SLake@usa.doj.gov>, "Bishop_steptoe.com" <Bishop@steptoe.com>, "Fragale, David" <DFragale@steptoe.com>, "Levin, Michelle" <mlevin@steptoe.com>, "Silverman, Nicholas" <nsilverman@steptoe.com>, "Weingarten, Reid" <RWeingarten@steptoe.com>, "Lynch, Garrett" <LynchG@dany.nyc.gov>, "Lynch, Garrett (USANYS) [Contractor]" <GLynch@usa.doj.gov>, "Heberlig, Brian" <BHeberlig@steptoe.com>, "Krouse, Michael (USANYS)" <MKrouse@usa.doj.gov>
Subject: RE: Order in 18cr224

Counsel,

Attached please find a third Order from Judge Nathan that will appear on the docket on Monday. Please confirm receipt.

Sincerely,
Alyssa O'Gallagher
Law Clerk to the Hon. Alison J. Nathan

From: Nathan NYSD Chambers
Sent: Sunday, March 8, 2020 4:04 PM
To: 'Kim, Jane (USANYS) 4' <Jane.Kim@usdoj.gov>; 'Lake, Stephanie (USANYS)' <Stephanie.Lake@usdoj.gov>; Bishop_steptoe.com <Bishop@steptoe.com>; 'Fragale, David' <DFragale@steptoe.com>; 'Levin, Michelle' <mlevin@steptoe.com>; 'Silverman, Nicholas' <nsilverman@steptoe.com>; 'Weingarten, Reid' <RWeingarten@steptoe.com>; 'Lynch, Garrett' <LynchG@dany.nyc.gov>; 'Lynch, Garrett (USANYS) [Contractor]' <Garrett.Lynch@usdoj.gov>; 'Heberlig, Brian' <BHeberlig@steptoe.com>; 'Krouse, Michael (USANYS)' <Michael.Krouse@usdoj.gov>
Subject: RE: Order in 18cr224

Counsel,

Attached please find another Order from Judge Nathan that will appear on the docket on Monday. Please confirm receipt.

Sincerely,

Alyssa O’Gallagher
Law Clerk to the Hon. Alison J. Nathan

From: Nathan NYSD Chambers
Sent: Sunday, March 8, 2020 12:48 PM
To: Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>; Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>; Bbishop_steptoe.com <Bbishop@steptoe.com>; Fragale, David <DFragale@steptoe.com>; Levin, Michelle <mlevin@steptoe.com>; Silverman, Nicholas <nsilverman@steptoe.com>; Weingarten, Reid <RWeingarten@steptoe.com>; Lynch, Garrett <LynchG@dany.nyc.gov>; Lynch, Garrett (USANYS) [Contractor] <Garrett.Lynch@usdoj.gov>; Heberlig, Brian <BHeberlig@steptoe.com>; Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>
Subject: RE: Order in 18cr224

Counsel,

Please confirm receipt of this Order.

Sincerely,
Alyssa O’Gallagher
Law Clerk to the Hon. Alison J. Nathan

From: Nathan NYSD Chambers
Sent: Sunday, March 8, 2020 12:41 PM
To: Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>; Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>; Bbishop_steptoe.com <Bbishop@steptoe.com>; Fragale, David <DFragale@steptoe.com>; Levin, Michelle <mlevin@steptoe.com>; Silverman, Nicholas <nsilverman@steptoe.com>; Weingarten, Reid <RWeingarten@steptoe.com>; Lynch, Garrett <LynchG@dany.nyc.gov>; Lynch, Garrett (USANYS) [Contractor] <Garrett.Lynch@usdoj.gov>; Heberlig, Brian <BHeberlig@steptoe.com>; Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>
Subject: Order in 18cr224

Counsel,

Attached please find an Order from Judge Nathan that will appear on the docket on Monday.

Sincerely,
Alyssa O’Gallagher
Law Clerk to the Hon. Alison J. Nathan

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

United States of America,

—v—

Ali Sadr Hashemi Nejad,

Defendant.

18-cr-224 (AJN)

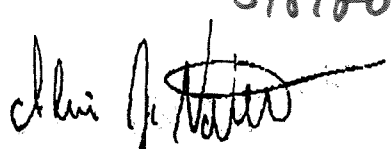
ORDER

ALISON J. NATHAN, District Judge:

In its response letter to be filed by 7 p.m., the Government shall include a detailed representation to the Court that explains why Government Exhibit 411 was not previously disclosed and what led to its disclosure for the first time yesterday. That representation shall further specify all attorneys involved in the decision-making with respect to both the non-disclosure and the subsequent disclosure yesterday of this document.

SO ORDERED.

Dated: March 8, 2020
New York, New York

3/8/20

ALISON J. NATHAN
United States District Judge

2020.3.8 5.57-6.12pm Chat

Lake, Stephanie (USANYS)

From: Bove, Emil (USANYS)
Sent: Sunday, March 08, 2020 6:20 PM
To: Bove, Emil (USANYS); Lake, Stephanie (USANYS)
Subject: Order in 18cr224

Bove, Emil (USANYS) 5:57 PM:

would it be helpful if i look at the dc cir case?

Lake, Stephanie (USANYS) 5:57 PM:

yes, if you don't mind

Emil J. . Bove 5:57 PM:

of course - on it

Emil J. . Bove 6:11 PM:

let's, um, not bring up the ddc case

Lake, Stephanie (USANYS) 6:11 PM:

what happened?

Emil J. . Bove 6:12 PM:

there were some crime scene photos that didn't get disclosed based in part on the witness having forgotten about them

it just compares kind of similarly to our situation and the instruction the judge gave was a compromise from (not surprisingly) a more aggressive POS sought by heber-dick

2020.3.8 5.58pm - 2020.3.9 4.35pm Email Chain & Attachment

Lake, Stephanie (USANYS)

From: Kaveh.Miremadi@treasury.gov
Sent: Monday, March 09, 2020 4:35 PM
To: Kim, Jane (USANYS) 4
Cc: Bove, Emil (USANYS); MariaHelene.VanWagenberg@treasury.gov; Jacqueline.Brewer@treasury.gov; Lake, Stephanie (USANYS); Krouse, Michael (USANYS); LynchG@dany.nyc.gov; Lynch, Garrett (USANYS) [Contractor]; Crowley, Shawn (USANYS)
Subject: Re: Time Sensitive Question

I'm available now for a call. Thanks.

From: Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>
Date: March 9, 2020 at 4:07:18 PM EDT
To: Miremadi, Kaveh <Kaveh.Miremadi@treasury.gov>
Cc: Bove, Emil (USANYS) <Emil.Bove@usdoj.gov>, Van Wagenberg, Maria-Helene <MariaHelene.VanWagenberg@treasury.gov>, Brewer, Jacqueline <Jacqueline.Brewer@treasury.gov>, Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>, Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>, LynchG@dany.nyc.gov <LynchG@dany.nyc.gov>, Lynch, Garrett (USANYS) [Contractor] <Garrett.Lynch@usdoj.gov>, Crowley, Shawn (USANYS) <Shawn.Crowley@usdoj.gov>
Subject: Re: Time Sensitive Question

**** Caution:** External email. Pay attention to suspicious links and attachments. Send suspicious email to suspect@treasury.gov **

Kaveh, just tried your cell. Please let me know when you're free to talk. Thanks.

On Mar 9, 2020, at 10:50 AM, "Kaveh.Miremadi@treasury.gov" <Kaveh.Miremadi@treasury.gov> wrote:

Cell: 202-746-4485

From: Bove, Emil (USANYS) <Emil.Bove@usdoj.gov>
Sent: Monday, March 9, 2020 10:25 AM
To: Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>
Cc: Miremadi, Kaveh <Kaveh.Miremadi@treasury.gov>; Van Wagenberg, Maria-Helene <MariaHelene.VanWagenberg@treasury.gov>; Brewer, Jacqueline <Jacqueline.Brewer@treasury.gov>; Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>; Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>; LynchG@dany.nyc.gov; Lynch, Garrett (USANYS) [Contractor] <Garrett.Lynch@usdoj.gov>; Crowley, Shawn (USANYS) <Shawn.Crowley@usdoj.gov>
Subject: Re: Time Sensitive Question

**** Caution:** External email. Pay attention to suspicious links and attachments. Send suspicious email to suspect@treasury.gov **

Hi Kaveh, what number can we reach you at?

On Mar 9, 2020, at 10:04 AM, Kim, Jane (USANYS) 4 <Kim4@usa.doj.gov> wrote:

I don't. I'm adding my Chiefs to this chain.

On Mar 9, 2020, at 9:23 AM, "Kaveh.Miremadi@treasury.gov" <Kaveh.Miremadi@treasury.gov> wrote:

Hi Jane,

Do you know who or what division in OFAC this letter was sent to? I'm searching our records now. We may not be able to get you a comprehensive answer this morning.

Kaveh

From: Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>
Sent: Sunday, March 8, 2020 5:58 PM
To: Miremadi, Kaveh <Kaveh.Miremadi@treasury.gov>; Van Wagenberg, Maria-Helene <MariaHelene.VanWagenberg@treasury.gov>; Brewer, Jacqueline <Jacqueline.Brewer@treasury.gov>
Cc: Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>; Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>; Lynch, Garrett <LynchG@dany.nyc.gov>; Lynch, Garrett (USANYS) [Contractor] <Garrett.Lynch@usdoj.gov>
Subject: Time Sensitive Question

**** Caution:** External email. Pay attention to suspicious links and attachments. Send suspicious email to suspect@treasury.gov **

Kaveh, Maria, and Jacqui:

I'm attaching a letter dated June 16, 2011, from Commerzbank to OFAC concerning a specific payment. Could you please let us know what actions OFAC took in response to this letter? We need to update the

Court on this issue tomorrow morning, so any information would be hugely appreciated.

Thank you in advance,
Jane

Jane Kim
Assistant United States Attorney
Southern District of New York
One St. Andrew's Plaza
New York, New York 10007
Phone: (212) 637-2038
Email: jane.kim@usdoj.gov



NEW YORK BRANCH

Department of the Treasury
Office of Foreign Assets Control
1500 Pennsylvania Avenue NW
Washington DC 20220

Vinay Jepsal
2 World Financial Center, New York, NY 10281-1050
Telephone (212) 266-7200
Fax (212) 266-7235
vinay.jepsal@commerzbank.com

June 16, 2011

Re: Information Sharing – Stratus International Contracting Company

Dear Sir/Madam:

Commerzbank AG, New York Branch (CBNY) would like to share the following information with OFAC. On April 20, 2011 CBNY's AML transaction monitoring system generated an alert, which involved a transaction for USD 29,442,967.57 value April 4, 2011.

The transaction was originated by Banco Del Tesoro, CA Banco Universal Caracas for its client BT / Fideicomiso / Fondo Chino Venezolano in Caracas, Venezuela. The beneficiary of the payment was Stratus International Contracting Company ("Stratus"), a client of HypoSwiss Privatbank AG, Zurich.

As per standard procedure, CBNY initiated a request for information to the remitting bank Banco Del Tesoro, CA Banco Universal Caracas, Venezuela to obtain details on both entities and their relationship. In the interim, CBNY conducted further due diligence and noted the following regarding Stratus from its website:

- Stratus was founded in 1978 in Tehran, Iran
- Stratus International specializes in providing contracting services to infrastructure projects such as roads, railways, dams, tunnels, airports and buildings.
- Stratus is presently working on a 7000 Apartment Unit "New Ojeda" Housing Development Project in Venezuela

On May 12, 2011, CBNY received a response from the bank in Caracas indicating the following:

- Stratus's physical address is Gardenya Plaza 5, K:3 D:3 (Floor 3, Suite3) 34758 Atasehir, Istanbul, Turkey
- Stratus is registered in Istanbul, Turkey (copy of the registration attached)
- Stratus provides construction services in Turkey, Dubai and Venezuela
- The purpose of the payment is for the construction of a 7000 apartment unit project "Proyecto Urbanismo Nueva Ciudad Fabricio Ojeda, in Ciudad Ojeda, Estado Zulia, Venezuela (same address as listed on Stratus' website)

Although Stratus is not listed as an SDN, and the payment does not indicate any direct involvement of Iran or with Iran, due to conflicting information between the website and the response forwarded by the bank in Caracas, CBNY believes it appropriate to share this information with OFAC since Stratus may be an Iranian Company.

Chairman of the Supervisory Board: Klaus-Peter Müller
Board of Managing Directors: Martin Blessing (Chairman),
Frank Annuscheit, Markus Beumer, Achim Kassow, Jochen Klösges,
Michael Reuther, Stefan Schmittmann, Ulrich Sieber, Eric Strutz, Martin Zielke

Commerzbank Aktiengesellschaft, Frankfurt am Main
Registered Office: Frankfurt am Main Reg.No. 32000
VAT No. DE 114 103 514



NEW YORK BRANCH

Re: Information Sharing – Stratus International Contracting Company– Page 2

We have added Stratus into our sanctions filter to monitor any future payments. Please note that apart from this transaction, there have not been any other payments involving Stratus processed by CBNY to date.

The purpose of this letter is to report the good faith efforts of Commerzbank AG, New York Branch in complying with applicable OFAC requirements and voluntarily informing OFAC of any information received during its investigation into possible sanctions-related entities.

Should you have any further questions concerning this matter, please do not hesitate to contact the signatories below.

Respectfully,

Commerzbank AG
New York Branch

A handwritten signature in dark ink, appearing to read "Deepa Keswani".

Deepa Keswani
Head of AML/Anti-Fraud/Sanctions Compliance

A handwritten signature in dark ink, appearing to read "Vinay Jepal".

Vinay Jepal
Sanctions Compliance Officer

Encls.

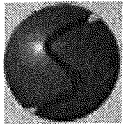
stratus intl payment

:LT Address	:COBAUS3XA
:transaction type	:202 COVER bank tfr favour 3rd bank
:input from	:COBADEFF
	COMMERZBANK AG FRANKFURT
	HEAD OFFICE
	32-36 NEUE MAINZERSTRASSE
	60261 FRANKFURT GERMANY
:validation Flag	:COV}

{4: Text block:

:20 /transaction reference number	:FAAS109400150500
:21 /related reference	:FAAS109400150500
:32A/value date	:040411 USD 29,442,967.57
:52A/ordering institution - BIC	:COBADEFF
	COMMERZBANK AG
	FRANKFURT AM MAIN
:57A/account with inst - BIC	:CHASUS33
	JPMORGAN CHASE BANK, N.A.
	NEW YORK, NY
:58A/beneficiary inst - BIC	:SHHBCHZZ
	HYPOSWISS PRIVATBANK AG, ZURICH
	ZURICH
:50K/ordering customer	:/400887746602USD
	BT/ FIDEICOMISO / FONDO CHINO
	VENEZOLANO. AV GUICAIPURO. URB EL
	ROSAL. TORRE BANCO DEL TESORO.
	CARACAS - VENEZUELA.
:52A/ordering institution - BIC	:BDTEVECA
	BANCO DEL TESORO, C.A. BANCO
	UNIVERSAL
	CARACAS
:59 /beneficiary customer	:/CH7708530519663100203
	STRATUS INTERNATIONAL CONTRACTING
	J.S.
:70 /details of payment	:REF: DESEMBOLSO NRO. 386 FONDO
	CHINO VENEZOLANO. CODIGO NRO.
	00579.
:33B/amount	:USD 29,442,967.57}

Entry : /SWIFT/ Date:110404 Time:02:44:17
Info:1111/001781



Stratus International
Contracting Company

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STRATUS International Contracting Company has been founded in 1978 in Tehran, Iran, with registered paid up share capital of RIs 100 billions. STRATUS provides contracting services to infrastructure projects such as Roads, Railways, Dams, Tunnels, Airports and Buildings. Since 1994, STRATUS has been the first pioneered company in exporting Engineering and Technical Services in Iran and received **"Exemplary Exporters"** of the year 1999 from his excellency Mr. president.



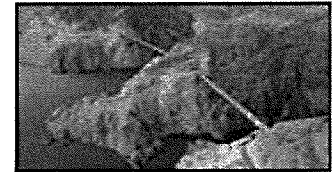
- STRATUS is an Engineering, Construction, Management and Contracting Company by specializing in the field of Building Construction, Road Works and Water Works.

STRATUS is Graded in three major categories: [Read more...](#)

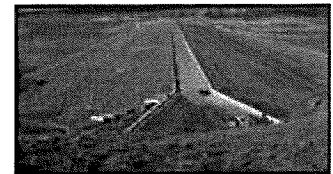
- STRATUS has succeeded to receive ISO 9001-2000 certificate for Quality Management System from MIC registered under UKAS, United Kingdom from 2004 which upgraded recently to ISO 9001-2008 in 2010 and intending to extend it by OHSAS 18001:2007. [Read more...](#)

- Our memberships:
 - Federation of Contractors of Islamic Countries (F.C.I.C.)
 - Pakistan Engineering Council
 - International Chamber of Commerce (I.C.C.)
 - Iran – UK Chamber of Commerce
 - Iran – Canada Chamber of Commerce [Read more...](#)

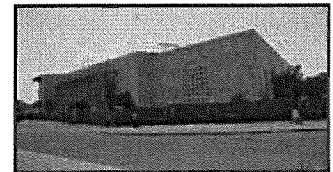
Road & Railway

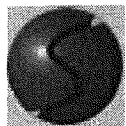


Dam



Building

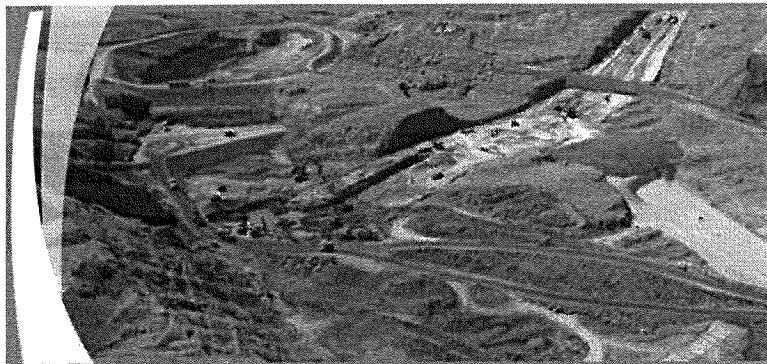




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Contact Us

STRATUS International Contracting Co.

Address: **No.35, Golestan St., Iran Zamin Ave., Shahrake Ghods, Tehran, Iran.**

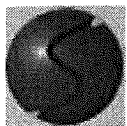
Postal Code: **1465865187**

Tell: **(98) 21 8837 3100-6**

Fax: **(98) 21 8808 2882**

E-mail: **stratus@stratusgc.com**

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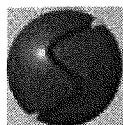
Branch Offices

Middle East
Iran
Iraq

CIS
Kazakhstan

South America
Venezuela

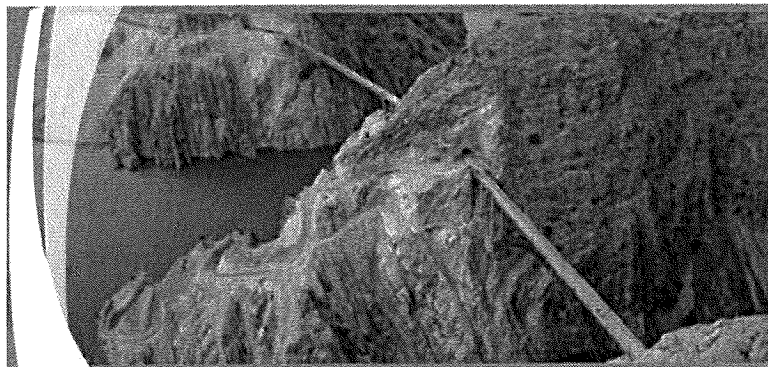
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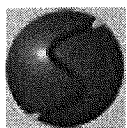
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Sister Companies List

-  1. Samaneh Stratus (INVESTMENT CO.)
-  2. Iran Construction Investment Co.
-  3. Eghtesad - Novin Bank
4. Pishgaman Bazar Novin (BROKERAGE CO.)
-  5. Novin Insurance Co.
-  6. Pars Shahr Co.
-  7. Global Petro Tech CO.
-  8. Keyhan Tabadol Co.
-  9. Pars Hanza Aluminium CO.
-  10. Azarbaijan Industry Development Co.
11. Eghtesad Novin Investment CO.
-  12. Samaneh Gostar Novin

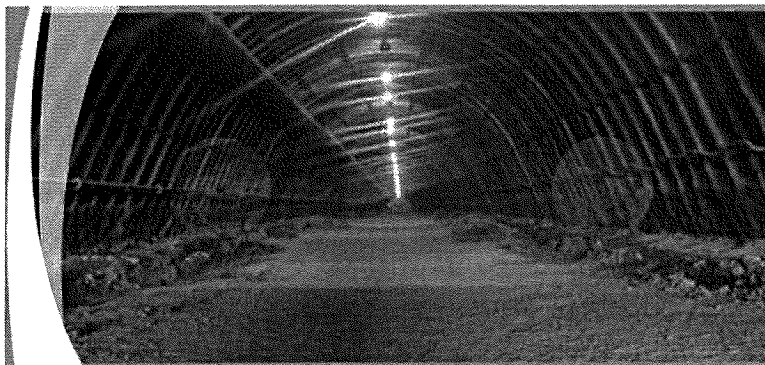
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7000 Units 'New Ojeda' Housing Development Project

Main Technical Features	Site Gross Area : 318 Hec. Concrete works : 520,000 m ³ Net Construction Area : 850.000 m ² Water & Sewage network : 150 Km Electrical network : 200 Km Communication network : 220 Km Gas network : 30 Km
Location	Ciudad Ojeda, Zulia State, Venezuela
Employer	Ducolsa 'Urban Development S.A'
Contract Duration	48 Months
Date of Award	September 2009
Status	[Under Construction]



[\[Back to list\]](#)



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Dalbandin – Nokkundi Highway - Section III-B

[Details >>](#)



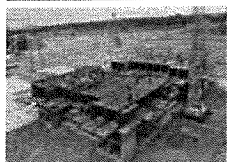
Socotra Airport

[Details >>](#)



Design & Construction of Parliament Building & Commercial Center in Djibouti City

[Details >>](#)



7000 Units "New Ojeda" Housing Development Project

[Details >>](#)

T.C.
İSTANBUL
Ticaret Sicil Memurluğu

(KADIKÖY)
370857 - 2010

SİCİL TASDİKNAME Sİ

Ticaret Ünvanı	STRATUS INTERNATIONAL CONTRACTING İNŞAAT VE TAAHHÜT ANONİM ŞİRKETİ
Sicil No.	751671
Tescil Tarihi	22 / 10 / 2010
İşletme Merkezinin Adresi (Şubenin tescilinde şubenin Adresi ile beraber,merkezin adresi de yazılır.)	GARDENYA PLAZA 5 K.3 D.3 ATAŞEHİR
İşletmenin uğraştığı işler	Ana sözleşmesinde yazılı olan işler
İşletme sahibinin hüviyeti (Hükmi şahıslarda, hükmi şahsın mahiyeti)	Anonim
İşletme temsilcileri	38824643592 TC.No.lu CELAL TATLICIBAŞI
Tasdiknamenin düzenlenme Tarih ve Sayısı	22 EKİM 2010 - 39185

RECAİ SÖKMEN
İSTANBUL TİCARET SİCİLİ
MEMURU YARDIMCISI

